

AO 91 (Rev. 02/09) Criminal Complaint

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**United States District Court  
for the**

**Western District of New York**

**United States of America**

**v.**

**Case No. 24-MJ- 4134**

**ANGEL REYES-CASTILLO,**

*Defendant*

**CRIMINAL COMPLAINT**

I, Andrew Farnham, Special Agent, Bureau of Alcohol, Tobacco, Firearms, and Explosives, the complainant in this case, state that the following is true to the best of my knowledge and belief:

On or before November 20, 2024, in the Western District of New York and elsewhere, the defendant, ANGEL REYES-CASTILLO:

knowingly and willfully used a means of identification of another person during and in relation to violations of the Social Security Act, *to wit*, violations of Title 42, United States Code, Sections 408(a)(7)(B) and 408(a)(7)(C), as alleged below, without lawful authority to do so,

all in violation of Title 18, United States Code, Section 1028A (Aggravated Identity Theft); and

for the purpose of satisfying a requirement of the employment verification system set forth in subsection 1324a(b) of Title 8 of the United States Code, used a false attestation on an I-9 Employment Eligibility Verification Form, knowing that the said attestation was false,

all in violation of Title 18, United States Code, Section 1546(b)(3); and

for the purpose of obtaining something of value, *i.e.*, employment in the United States, and for other purposes, knowingly, willfully and with the intent to deceive, made a materially false statement in an I-9 Employment Eligibility Verification Form, using the name A.S., and falsely and fraudulently represented his Social Security Number to be XXX-XX-0132, when in fact neither XXX-XX-XXXX nor any other Social Security Number had ever been assigned to the defendant,

all in violation of Title 42, United States Code, Section 408(a)(7)(B); and

for the purpose of obtaining something of value, *i.e.*, employment in the United States, and for other purposes, knowingly and intentionally purchased a counterfeit Social Security Card bearing Social Security Number XXX-XX-0132,

all in violation of Title 42, United States Code, Section 408(a)(7)(C).

This Criminal Complaint is based on these facts:

**SEE ATTACHED AFFIDAVIT OF Special Agent Andrew Farnham**

☒ Continued on the attached sheet.



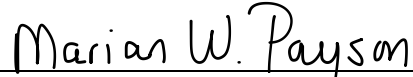
*Complainant's signature*

Andrew Farnham, Special Agent, ATF

*Printed name and title*

Affidavit and Criminal Complaint submitted electronically by email in .pdf format. Oath administered, and contents and signature attested to me as true and accurate telephonically pursuant to Fed.R.Crim. P. 4.1 and 4(d) on:

Date: November 21, 2024



*Judge's signature*

City and State: Rochester, New York

HON. MARIAN W. PAYSON  
UNITED STATES MAGISTRATE JUDGE

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

STATE OF NEW YORK    )  
COUNTY OF MONROE    )       SS:  
CITY OF ROCHESTER    )

I, ANDREW FARNHAM, being duly sworn, depose and state the following:

**INTRODUCTION AND AGENT BACKGROUND**

1. Your affiant is a Special Agent (SA) with the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), assigned to the New York Field Division, Rochester Field Office. Your affiant is a graduate of the Criminal Investigator School and the ATF National Academy, both located at the Federal Law Enforcement Training Center in Glynco, Georgia. I have been employed as a Special Agent since February 2019. Prior to being employed as a Special Agent, I was employed as a United States Border Patrol Agent beginning in 2008, in Ogdensburg, New York until February of 2019. In August 2021, your affiant completed the Firearms Interstate Nexus Training Course in Martinsburg, West Virginia. As part of my professional experience, I have participated in state and federal investigations involving the illegal possession of firearms and narcotics, narcotics trafficking, and other violations of federal and state law.

2. This affidavit is submitted in support of a criminal complaint charging Angel REYES-CASTILLO (hereinafter "CASTILLO") with violating Title 18, United States Code, Section 1028A (Aggravated Identity Theft), Title 18, United States Code, Section 1546(b)(3), (Use of a False Attestation to Satisfy a Requirement under the INA), Title 42, United States Code, Section 408(7)(B) (Use of a False Social Security Number), and Title 42, United States

Code, Section 408(a)(7)(C) (Purchase of a Counterfeit Social Security Card) (hereinafter, collectively the “TARGET OFFENSES”).

3. The assertions made herein are based solely upon the personal knowledge of your affiant and information I have received from this investigation, including a review of reports and discussions with other law enforcement officers involved with this investigation.

4. Because this affidavit is submitted for the limited purpose of obtaining a criminal complaint, I have not included each and every fact known to me concerning this investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause to believe that CASTILLO committed the TARGET OFFENSES.

#### **PROBABLE CAUSE**

5. As is set forth in further detail below, CASTILLO is a citizen of the Dominican Republic who has been illegally living and working in the Western District of New York. CASTILLO has been using the name and Social Security Number of A.S., a real person who resides outside of the Western District of New York and has no apparent relationship with CASTILLO.

6. CASTILLO came to the attention of law enforcement during a narcotics investigation.

7. Specifically, on or about July 8, 2024, the United States Postal (USPS) delivered a package weighing 8 lbs. 7 oz that was addressed to “A.S.” at LOCATION 1. According to a USPS investigator, based upon the package’s weight and other characteristics,

the timing and location of its delivery, and the investigator's knowledge, experience, and training in investigations related to the distribution of narcotics, law enforcement believed that this package contained narcotics.

8. On or about July 22, 2024, the United States Postal Service delivered a second package weighing 10lbs 8.4 oz package also addressed to "A.S." at LOCATION 2. Once again, according to a USPS investigator, based upon the package's weight and other characteristics, the timing and location of its delivery, and the investigator's knowledge, experience, and training in investigations related to the distribution of narcotics, law enforcement believed that this package contained narcotics.

9. On or about July 23, 2024, USPS interdicted a third package containing 4,145 grams of cocaine, which was addressed to "A.S." at LOCATION 1.

10. LOCATION 1 and LOCATION 2 are associated with L.S., who is currently wanted on state charges in connection with a quadruple homicide that occurred or about August 30, 2024. LOCATION 1 was L.S.'s last known residence. LOCATION 2 is L.S.'s girlfriend's residence.

11. In or around the first week of September 2024, Irondequoit Police Department (IPD) executed a search warrant at LOCATION 1 and other locations associated with the Irondequoit homicides.

12. In the course of the homicide investigation, "A.S." became a person of interest. IPD was able to obtain a picture of "A.S."s NY Driver's License #121412671 and Social Security Card number XXX-XX-0132.

13. Facial recognition software indicated that the individual pictured in NY Driver's License #121412671 was actually Angel REYES-CASTILLO. CASTILLO is a citizen of the Dominican Republic and is not legally present in the United States.

14. Further investigation into CASTILLO revealed he had obtained employment with Nordon, Inc., in Rochester, NY.

15. Law enforcement approached Nordon representatives and obtained copies of CASTILLO's I-9 Form Employment Verification, which CASTILLO had to complete and submit in order to obtain employment in the United States.

16. On the I-9 Form Employment Verification, CASTILLO identified himself as "A.S" and falsely claimed that he was a citizen of the United States.

17. CASTILLO also submitted two forms of identification to verify his identity: NY Driver's License #121412671 and Social Security Card # XXXXX0132. Both were in the name of A.S.

18. CASTILLO completed the I-9 Form Employment Verification by signing an attestation under penalty of perjury, which affirmed that all the information contained in the I-9 Form was true.

19. According to the Social Security Administration Office of the Inspector General, Social Security number (SSN) XXX-XX-0132 is a valid SSN issued to someone other than CASTILLO. Neither SSN XXX-XX-0132 nor any other SSN has ever been issued to CASTILLO.

20. On or about November 20, 2024, United States Border Patrol (BP) agents observed CASTILLO getting off a City of Rochester bus and going to Nordon, Inc.

21. BP transported CASTILLO to the BP field office in Irondequoit, NY, for further processing.

22. Fingerprints taken at the BP office during processing revealed CASTILLO's true and correct name as Angel REYES-CASTILLO (DOB 2/20/90).

23. According to CASTILLO's immigration records, in or around 2018, he applied for a visa and was denied. In or around 2020, CASTILLO entered the United States seeking asylum. CASTILLO subsequently failed to appear at his court hearing on the asylum application and was ordered deported in absentia.

24. CASTILLO was taken from BP to IPD, where he was given his *Miranda* warnings in Spanish, waived them, and agreed to talk law enforcement. In sum and substance, CASTILLO admitted to purchasing a Puerto Rican ID and Social Security card bearing #XXX-XX-0132 for \$1800 from L.S., the individual who is currently wanted in connection with a quadruple homicide in Irondequoit, NY. CASTILLO further admitted that he used the fraudulent documents to obtain employment at Nordon, Inc.

**CONCLUSION**

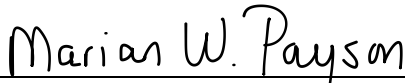
25. Based on the foregoing, I respectfully submit that there is probable cause to believe that CASTILLO committed the TARGET OFFENSES.



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ANDREW FARNHAM  
Special Agent  
Bureau of Alcohol, Tobacco, Firearms,  
and Explosives

Affidavit and Criminal Complaint submitted electronically by email in .pdf format. Oath administered, and contents and signature, attested to me as true and accurate telephonically pursuant to Fed.R.Crim.P. 4.1 and 4(d) on November 21, 2024.



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HON. MARIAN W. PAYSON  
United States Magistrate Judge